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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

ANIMAL WELLNESS ACTION, a non-
 profit corporation, CANA FOUNDATION,
 a non-profit corporation, THE CENTER FOR
 A HUMANE ECONOMY, a non-profit
 corporation, LAURA LEIGH, individually, and
 WILD HORSE EDUCATION, a non-profit
 corporation,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
 INTERIOR, BUREAU OF LAND
 MANAGEMENT, and JON RABY,
 Nevada State Director of the Bureau of Land
 Management,

Defendants.

Case No: 3:22-cv-00034-MMD-CLB

**JOINT STIPULATION TO EXTEND
 THE DEADLINE FOR FILING A
 MOTION FOR ATTORNEYS' FEES
 AND COSTS**

Pursuant to Local Rule IA 6-1, Plaintiffs Animal Wellness Action, Cana Foundation, the Center for a Humane Economy, Laura Leigh, and Wild Horse Education, and Defendants United States Department of Interior, Bureau of Land Management ("BLM"), and Jon Raby, in his official capacity as Nevada State Director of the BLM, (collectively, the "Parties"), by and through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the time to file any motions related to attorneys' fees and costs 60 days, until August 12, 2024. In support of this request, the Parties declare:

1 WHEREAS, on March 28, 2024, the Court issued an opinion and order on the Parties'
2 cross-motions for summary judgment. ECF No. 81.

3 WHEREAS, on March 29, 2024, judgment was entered by the Clerk of the Court. ECF
4 No. 82.

5 WHEREAS, on April 10, 2024, the parties filed a joint stipulation to extend the time
6 needed to explore the settlement of attorneys' fees and costs. ECF No. 83.

7 WHEREAS, on April 11, 2024, the Court granted the parties' joint stipulation. ECF
8 No. 84.

9 WHEREAS, the Parties remain interested in and are working cooperatively towards
10 settlement. Counsel for the Defendants has been delayed in responding to a settlement offer
11 by Plaintiffs due to unexpected litigation deadlines, including extensive travel, depositions,
12 and emergency motions. The Parties now agree that additional time is needed to explore the
13 settlement of attorneys' fees and costs.

14 WHEREAS, this is the second stipulation for an extension of time to file a motion for
15 attorneys' fees and costs.

16 WHEREAS, it is well-established that the court has the inherent power to "control the
17 disposition of the causes on its docket with economy of time and effort for itself, for counsel,
18 and for litigants." *Landis v. North Am. Co.*, 299 U.S. 248, 254 (1936); *CMAX, Inc. v. Hall*,
19 300 F.2d 265, 268 (9th Cir. 1962); *Leyva v. Certified Grocers of California*, 593 F.2d 857,
20 863-64 (9th Cir. 1979).

21 NOW, THEREFORE, IT IS STIPULATED BY AND BETWEEN THE PARTIES,
22 AND THE COURT ORDERS, AS FOLLOWS:

- 23 1. Upon entry of the Court's order, the deadline to file any motion for attorneys' fees
24 and costs is extended from June 11, 2024, until August 12, 2024.

25 IT IS SO STIPULATED.

26 Dated: June 6, 2024

Respectfully submitted,

27 TODD KIM
28

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U.S. Department of Justice
Environment & Natural Resources Division
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IT IS SO ORDERED:

Hon. MIRANDA M. DU
UNITED STATES DISTRICT JUDGE

DATED: _____

CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2024, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the District of Nevada using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system, which includes counsel of record for all parties in the case.

/s/ Samantha G. Peltz
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Attorney for Defendant